

UNITED STATES DISTRICT COURT
THE DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
)	
)	No.: 21-CR-41-05-JL
v.)	
)	
NOBODY)	
_____)	

MOTION TO AMEND ORDER OF CONDITIONS OF RELEASE

NOW comes the defendant in the above entitled matter and respectfully moves this Honorable Court to amend its Order of release dated September 1, 2021, to amend the conditions of his release.

As grounds therefore, it is stated that:

1. The defendant was initially ordered detained after waiving a detention hearing.
2. On September 1, 2021 this Honorable Court ordered release of the defendant on conditions.
3. The defendant was subsequently released and has acted in accord with the conditions upon him.
4. The defendant would like to take part in the "Free Talk Live" program with co-defendants Freeman and DiMezzo.
5. The defendant would like to be able to speak about anything, other than the pending charges against he and the co-defendants, while on said program.
6. The defendant would like to be able to communicate with co-defendants, Freeman and DiMezzo, via mail, telephone, and in person.
7. The United States has been informed of this motion and does not assent to its allowance.
8. No legal memorandum accompanies this motion as the relief requested is fully set out herein.

9. A hearing is requested on this matter.

WHEREFORE, the Defendant requests this Court:

- A. Amend this Honorable Court's Order of Conditions of Release of September 1, 2021 and allow:
 - i. Contact with codefendants DiMezzo and Freeman;
 - ii. The ability to appear on the "Free Talk Live" program; and
 - iii. Speak openly about any issue except for the subject of the prosecution related to this pending matter.
- B. Such other relief as the Court deems just and equitable.

Respectfully submitted,
NOBODY
By his attorney

/s/ Patrick J. Richard

Dated: 1/10/2022

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CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of January 2022 served the foregoing motion by ECF delivery upon all parties of record.

/s/ Patrick J. Richard

Patrick J. Richard, Esq.